

Mitchell, Brian

From: Arnold, Doug <Doug.Arnold@alston.com>
Sent: Tuesday, February 05, 2019 1:36 PM
To: Mitchell, Brian
Subject: City of Jefferson CIS 1,2 Dichloroethylene
Attachments: Letter to Mr. Greg Fuhrmann dated February 5, 2019.pdf

Brian:

Golder Associates has no information about the potential source(s) of these impacts. By coincidence, my letter to IDNR about the LRP went out today. A copy is attached.

Doug

Douglas S. Arnold | Alston & Bird LLP
Partner and Co-Chair,
Environmental, Energy & Natural Resources Practice Group
1201 West Peachtree Street | Atlanta, GA 30309-3424
T: 404-881-7637 | F: 404-881-7777 | E: doug.arnold@alston.com | www.alston.com/doug_arnold/

Atlanta | Beijing | Brussels | Charlotte | Dallas | Los Angeles | New York | Research Triangle | San Francisco | Silicon Valley | Washington DC
19 Consecutive Years on Fortune® Magazine's "The 100 Best Companies to Work For"™

From: Mitchell, Brian [mailto:Mitchell.Brian@epa.gov]
Sent: Tuesday, February 5, 2019 10:41 AM
To: Arnold, Doug <Doug.Arnold@alston.com>
Subject: FW: City of Jefferson CIS 1,2 Dichloroethylene

Any thoughts on where this contamination is coming from? Did Electolux re-apply with the Iowa Voluntary Clean-up Program?

Brian Mitchell
RCRA Corrective Action Officer
EPA Region 7
AWMD/WRAP
2.3~ P44
11201 Renner Blvd
Lenexa, Kansas 66219
913-551-7633 work

RCRA 2/5/2019



816-304-4158 cell

From: Wilken, Keith <keith.wilken@dnr.iowa.gov>
Sent: Friday, February 01, 2019 2:26 PM
To: Mitchell, Brian <Mitchell.Brian@epa.gov>
Cc: Jefferson Water Plant <jeffwaterplant@hotmail.com>
Subject: City of Jefferson CIS 1,2 Dichloroethylene

Brian,

Good afternoon. Thank you for the telephone conversation this afternoon.

I have attached an aerial photograph from Jefferson's Phase II Source Water Protection Plan. This photograph depicts the locations of the 4 town wells in Jefferson.

The most recent sampling results from the wells were on 6/7/2017.

Well #4 yielded 0.00725 mg/L
Well #6 yielded 0.00092 mg/L
Well #9 yielded 0.0177 mg/L
Well #10 was <0.0005 mg/L

The most recent finished water (as the water leaves the treatment plant) sampling results are;

0.00131 mg/L on 12/4/2017
0.00163 mg/L on 4/2/2018
0.00147 mg/L on 10/9/2018

It would be greatly appreciated if you could keep us updated on the status of your investigation. Do not hesitate to let either myself or the City of Jefferson know if you need anything further.

Keith

----- Forwarded message -----

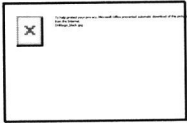
From: <DNRATLPRN02@iowa.gov>
Date: Fri, Feb 1, 2019 at 2:13 PM
Subject: Message from "DNRATLPRN02"
To: Keith Wilken <keith.wilken@dnr.iowa.gov>

This E-mail was sent from "DNRATLPRN02" (MP C4504ex).

Scan Date: 02.01.2019 14:11:08 (-0600)

Queries to: DNRATLPRN02@iowa.gov

--



Keith Wilken | Environmental Specialist Senior
Iowa Department of Natural Resources
P 712-243-1934 | F 712-243-6251 | 1401 Sunnyside Ln., Atlantic IA 50022
www.iowadnr.gov

NOTICE: This e-mail message and all attachments may contain legally privileged and confidential information intended solely for the use of the addressee. If you are not the intended recipient, you are hereby notified that you may not read, copy, distribute or otherwise use this message or its attachments. If you have received this message in error, please notify the sender by email and delete all copies of the message immediately.

ALSTON & BIRD

One Atlantic Center
1201 West Peachtree Street
Atlanta, GA 30309-3424
404-881-7000 | Fax: 404-253-8476

Douglas S. Arnold

Direct Dial: 404-881-7637

Email: doug.arnold@alston.com

February 5, 2019

Mr. Greg Fuhrmann
Land Recycling Program Coordinator
Iowa Department of Natural Resources
502 E 9th Street
Des Moines, IA 50319

Re: Electrolux Home Products (Electrolux)
Former Manufacturing Facility – Jefferson, IA

Dear Mr. Fuhrmann:

I am writing on behalf of our client, Electrolux, regarding its former facility located at 601 East Central Street, Jefferson, Iowa. As you may recall, Electrolux previously submitted an application to enroll the property in Iowa's Land Recycling Program (LRP). In a letter dated June 6, 2017, IDNR denied the application, citing municipal well analytical results from the City of Jefferson (City) that detected the presence of cis-1, 2 - Dichloroethylene.

In response, the United States Environmental Protection Agency (EPA) conducted two groundwater investigations. The stated purpose of both EPA investigations was to determine if any environmental impacts present at the Electrolux property have migrated downgradient toward the City's municipal water supply wells. In brief, neither investigation found any evidence of off-site groundwater impacts associated with the Electrolux property. Copies of the reports are enclosed.

EPA's findings are consistent with the results of numerous on-site investigations conducted by Electrolux's consultant, Golder Associates (Golder). The data from the most recent groundwater sampling, which Golder collected in 2018, reconfirms that the identified impacts to groundwater from prior site operations are confined within the Electrolux property boundaries and are naturally attenuating. A copy of Golder's 2018 report is also enclosed.

Based on the results of these investigations, Electrolux respectfully asks that IDNR reconsider its prior position regarding enrollment of the property in the LRP. EPA Region 7 has confirmed that it has no objections to this request. Also, Golder has identified several similar sites in Iowa with

Mr. Greg Fuhrmann
February 5, 2019
Page 2

chlorinated-impacts to groundwater (e.g., Aramark, CB&I Contractors, Henderson Manufacturing, Mayfair Cleaners, Victoria Cleaners, Marley Pump) that IDNR has accepted for LRP enrollment.

My client and I would greatly appreciate an opportunity to discuss this matter by telephone with you and your colleagues at your earliest convenience.

Regards,

ALSTON & BIRD LLP


Douglas S. Arnold

DSA:mfc

Enclosures: Toeroek Associates, *Groundwater Sampling Event Report of Findings, Rev. 01*, Former Electrolux, Inc. Facility, Jefferson, Iowa, Contract No. EP-W-13-002, Task Order 035 from U.S. EPA, Technical Directive No. 4, June 2, 2017

Toeroek Associates, *Monitoring Well Installation and Groundwater Sampling Event Final Report of Findings*, Former Electrolux, Inc. Facility, Jefferson, Iowa, Contract No. EP-W-13-002, Task Order 035 from U.S. EPA, Technical Directive No. 8, July 26, 2018

Golder Associates, *2018 Groundwater Monitoring Summary Report*, former Electrolux Home Products, Inc. Facility, January 2019, prepared by Golder Associates

cc: Andrew Stienecker, Esq., Electrolux Home Products
James Peace, Golder Associates
Doug Ucci, BSI Services and Solutions East Inc.
Don Lininger, EPA Region 7
Brian Mitchell, EPA Region 7